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July 16, 2021

**VIA ELECTRONIC CASE FILING
& ELECTRONIC TRANSMISSION**

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Walkie Check Productions, LLC* [“Walkie Check” or “Plaintiff”] v. *ViacomCBS Inc., Black Entertainment Television LLC d/b/a BET Networks, and BET Productions IV, LLC* [“Defendants”] (S.D.N.Y. Case No. 1:21-cv-01214-KPF)

Dear Judge Failla:

We represent Plaintiff Walkie Check Productions, LLC in the above-referenced action and write, pursuant to Rule 9(C) of Your Honor’s Individual Rules of Practice in Civil Cases (revised March 2, 2021), to seek leave to file under seal select documents and information related to Plaintiff’s motion to disqualify Defendants’ counsel.

The documents and information Plaintiff seeks to file under seal consist of confidential and/or privileged information that Plaintiff believes is necessary to present to the Court on its motion. In addition, in selecting the documents and/or information for proposed sealing, Plaintiff has attempted to limit the scope of its proposed sealing to that information that is necessary.

Thank you very much for your time and attention to this submission.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ken Aldous".
Kenneth E. Aldous

cc: Wook Hwang, Esq. (via electronic case filing & electronic transmission)

Application GRANTED. Plaintiff's papers in support of its motion to disqualify Defendants' counsel may be filed under seal, visible only to the Court and the parties. The Clerk of Court is directed to terminate the motion at docket entry 38.

Dated: July 19, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE